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October 27, 2023

The Honorable Andrew B. Altenburg, Jr., U.S.B.J.
Courtroom #4B
400 Cooper Street, 4th Floor
Camden, NJ 08101

RE: Christopher E. Beecken
Case No. 19-23709-ABA
Premises: 108 33rd Avenue, Monreville, NJ 08343
Secured Creditor: M&T Bank

Dear Judge Altenburg:

This office represents M&T Bank (“Secured Creditor”), holder of a mortgage on real property located at 108 33rd Avenue, Monreville, NJ 08343. Please accept this letter in response to Debtor’s motion to sell the subject property.

Secured Creditor has reviewed the current motion to sell and the proposed form of order filed with the Court. Secured Creditor does not object to the motion or the proposed order in its current form. However, should the proposed order be revised, or if the underlying facts supporting the motion should change, including but not limited to the purchase price, Secured Creditor reserves its right to object to the motion.

The Debtor is required to request an updated formal payoff prior to closing to ensure the loan is paid in full in accordance with the terms of the note, mortgage and applicable state laws. The current payoff is approximately \$170,479.76. Secured Creditor’s response, in its present form, is not an objection to the current motion to sell the subject property. The undersigned does not

intend to appear to prosecute an objection at this time unless the proposed order is amended to a form deemed objectionable.

Respectfully,
KML LAW GROUP, P.C.

/s/ Denise Carlon
Denise Carlon, Esquire
dcarlon@kmlawgroup.com
Attorney for Secured Creditor

Caption in Compliance with D.N.J. LBR-9004-1

KML Law Group, P.C.
By: Brian C. Nicholas Esquire
701 Market Street, Suite 5000
Philadelphia, PA 19106
201-549-5366
Attorneys for Secured Creditor: M&T Bank

In Re:
Christopher E. Beecken aka Christopher
Beecken
Debtor

Case No: 19-23709 ABA
Chapter: 13
Judge: Andrew B. Altenburg Jr.

CERTIFICATION OF SERVICE

1. I, Patricia Rychards :

☐ Represent the _____ in the above-captioned matter.

☒ am the secretary/paralegal for Brian C. Nicholas, who represents the Secured Creditor in the above captioned matter.

☐ am the _____ in the above case and am representing myself.

2. On 10/31/2023, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:

- Response to Motion to Sell
- Certification of Service

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: 10/31/2023

/s/ Patricia Rychards

Name and Address of Party Served	Relation of Party to the Case	Mode of Service
<p>Christopher E. Beecken aka Christopher Beecken 108 33rd Avenue Monroeville, NJ 08343</p>	<p>Debtor</p>	<p> <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court *) </p>
<p>S. Daniel Hutchison Law Office of S. Daniel Hutchison 135 North Broad Street Woodbury, NJ 08096</p>	<p>Attorney for Debtor</p>	<p> <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court *) </p>
<p>Andrew B. Finberg Esq. Chapter 13 Standing Trustee Cherry Tree Corporate Center - 535 Route 38 - Suite 580 Cherry Hill, NJ 08002</p>	<p>Chapter 13 Trustee</p>	<p> <input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court *) </p>